



March 18, 2019

BY ECF

Judge Paul A. Engelmayer
United States District Court for the Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 2201
New York, NY 10007

Re: *Doe v. Lima et al.* (14-cv-2953)

Dear Judge Engelmayer:

Pursuant to the Court's order dated March 7, 2019 (Dkt. No. 321), the parties in the above-captioned case met and conferred on March 13 and write jointly to share their "views as to the proper next steps in, and future course of this lawsuit."

At this time, the parties wish to explore the possibility of a negotiated resolution of the litigation. We would ask the Court to give the parties thirty (30) days to pursue discussions in aid of potential settlement, after which the parties would provide an update to the Court as to the status of those discussions. If no agreement has been reached, the parties intend to move forward with the damages trial that Your Honor previously adjourned pending the appeals on qualified immunity by Defendants Lima, Valerio, Cappiello, and Rosado, and we would at that time ask the Court to schedule a pretrial conference in accordance with Your Honor's individual rules to, *inter alia*, set a trial date and deadlines for the parties' pretrial submissions.

We look forward to the Court's guidance regarding next steps.

Respectfully submitted,

/s/ Blair R. Albom

Blair R. Albom
Friedman Kaplan Seiler & Adelman LLP
Attorneys for Plaintiffs

/s/ Nathan S. Richards

Nathan S. Richards
Debevoise & Plimpton LLP
Attorneys for Plaintiffs

/s/ Karena Rahall

Karena Rahall
Office of the Appellate Defender
Attorneys for Plaintiffs

/s/ Edward Michael Kratt

Edward Michael Kratt
Of Counsel to Hammock & Sullivan PC
Attorneys for Defendant Rosado

Judge Paul A. Engelmayer

- 2 -

March 18, 2019

/s/ Lawrence Henry Schaefer

Lawrence Henry Schaefer

Lippes Mathias Wexler & Friedman LLP

Attorneys for Defendants Lima and Valerio

/s/ Robert A. Soloway

Robert A. Soloway

Rothman Schneider Soloway & Stern LLP

Attorneys for Defendant Cappiello

/s/ Goetz L. Vilsaint

Goetz L. Vilsaint

Law Office of Goetz L. Vilsaint

Attorneys for Defendant Scott